

DEFENDANT ROTH ANTICIPATED EXHIBITS

1. Any and all exhibits introduced by Plaintiffs and/or Co-Defendants subject to redactions based on pre-trial orders
2. Any deposition transcripts subject to redactions based on pre-trial orders
3. Any exhibits introduced in depositions subject to redactions based on pre-trial orders
4. All documents exchanged in discovery subject to redactions based on pre-trial orders
5. Plaintiffs' medical and psychotherapy records
6. Job Description – First Assistant County Solicitor – Risk Manager
ROTH 00001-00002
7. Roth Offer Letter
County 0376
8. Roth Application for Employment
County 0378-379
9. PAR for Asst County Solicitor position – Roth
County 0366
10. Roth Policy Acknowledgement Forms
County 0386-397
11. Roth Authorization to Obtain Information, check for criminal background
County 0364
12. Roth Sexual Harassment Training Acknowledgment Form
County 0384
13. Roth; Another sexual harassment acknowledgement form
County 0381
14. Roth; Another sexual harassment acknowledgment form
County 0382
15. Roth; Another sexual harassment acknowledgment form
County 0398
16. The SC Organizational Chart
Zula 2473

17. PAR for Toomey, Tax Claim Director and assuming duties for coal lands
County 0418
18. Toomey Job Description for Tax Claim Director
County 0419-420
19. PAR for Toomey to become the interim director for Tax Claim and Assessment
County 0412
20. PAR for Toomey to be official director for Tax Claim and Assessment
County 0411
21. PAR for Gerchak for interim assistant tax assessment/tax claim position
County 0309
22. PAR for Goodman to interim field appraiser
County 0104
23. Toomey Email re: Coal Lands dated 2.13.15
Halcovage 301-302
24. Toomey Email to Halcovage re: Clerk Typist Position dated 6.17.16
Halcovage 377
25. Email from Toomey re: restructuring Tax Claim Office/vacancies dated 3.3.16
Halcovage 353 – 354
26. Toomey email dated 9.9.21
ZulaRFP 2816-2819
27. Bender's letter to Gerchak dated 9.17.21 re: Suspension
ZulaRFP 1832
28. Zula and Roth Emails with Lexis Rep dated August 2021
ZulaRFP 2767
29. Email from Zula to Heatherington re: LexisNexis
ZulaRFP 1366
30. Sexual Harassment Training Quiz – and signed by Roth
31. Position Description – HR Director November 2017
County 1138-1140
32. Letter to Toomey from Bender re: directing employees to WFH dated 1.15.21

DoeSupp 583-584

33. Zula and Toomey email re: Investigation Request/Retaliation dated 6.3.21
ZulaRFP 1802-1804
34. Bender and Zula email re: Toomey's PTO dated 3.18.21
ZulaRFP 715
35. Zula Email to Commissioners re: Goodman Job Abandonment dated 5.9.22
Zula RFP 1761, 1762
36. PAR for Gary Bender
County 20
37. Bender Policy Acknowledgement Forms
County 31-36
38. Bender Sexual Harassment Policy Acknowledgement Form dated 10/27/2006
County 27
39. Bender Sexual Harassment Policy/Training Acknowledgement Form dated 10/9/2013
County 28
40. Bender Sexual Harassment Policy Acknowledgement Form dated 5/14/2015
County 25
41. Bender PAR dated 6/8/2016 (Promotion)
County 6
42. Bender PAR dated 9/25/2013 (Promotion)
County 9
43. Bender Sexual Harassment Policy Acknowledgement Form dated 8/28/2019
County 24
44. Bender Anti-Harassment and Non-Discrimination Policy Acknowledgement Form and
Quiz 2/25/2021
County 22, 23
45. Position Description for County Administrator
County 1235-1238
46. Position Description for Real Estate Market Analyst
County 206-208

47. Position Description for Tax Claim Bureau Director; Revised 3/4/2008
County 1221, 1222
48. Position Description for Chief Assessor/Director of Tax Claim
County 1223, 1224
49. Position Description for Tax Claim Bureau Assistant Director
County 1215, 1216
50. Position Description for Assistant Director – Tax Claim/Tax Assessment
County 1217, 1218
51. Toomey Discipline for Interaction with Tony Alu; written warning dated 4/21/2021
County 405, 406
52. Gerchak Discipline for Interaction with Tony Alu; written warning dated 4/21/2021
County 304-306
53. Toomey Discipline – Suspension dated 5/17/2021 Re: Comments to Linda Marchalk and Paul Bauber
County 400-404
54. Toomey Policy Acknowledgment Computer Network and Internet Access Policy
ZulaRFP 2909
55. Toomey Signed Confidentiality Agreement
ZulaRFP 2907
56. Gerchak Signed Sexual Harassment and Discrimination Policies
County 337-338, 356-359
57. LexisNexis Accurint for Government Customer Education
ZulaRFP 2964-2979
58. Gerchak Signed Confidentiality Agreement
ZulaRFP 2906
59. PAR for Goodman Part-Time Employment and Job Application
County 126, 135-136
60. Goodman Sexual Harassment Policy Acknowledgment Forms
County 144-146
61. Halcovage Sexual Harassment Policy Acknowledgement Forms dated 12/5/2011
County 211-212

